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MEMO ENDORSED



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October 31, 2018

Via ECF and Hand Delivery

Hon. Edgardo Ramos U.S. District Court for the Southern District of New York 40 Foley Square Courtroom 619 New York, NY 10007 The application is X granted denied

Edgardo Ramos, U.S.D.J

Dated: <u>10/31/2018</u> New York, New York

Re: In re Application of Top Matrix Holdings Ltd for an Order to Take Discovery for Use in Foreign Proceedings Pursuant to 28 U.S.C. § 1782, 18 Misc. 465

Dear Judge Ramos:

This firm represents Respondents Credit Suisse Holdings (USA) Inc., Credit Suisse (USA), Credit Suisse Securities (USA) LLC, Credit Suisse Asset Management, LLC, and Brady W. Dougan, in the above captioned matter.

This matter was initiated as an *ex parte* application for an Order for discovery in connection with a foreign proceeding under 28 U.S.C. § 1782. Yesterday, we notified Petitioner that we would be entering our appearances, and we and the Petitioner have agreed to the following proposed briefing schedule, *in lieu* of the application being considered *ex parte*: (i) Respondents have until November 30, 2018 to file their opposition to the application; and (ii) Petitioners will have until December 14, 2018 to file a reply submission.

We respectfully seek Your Honor's endorsement of this request.

Thank you in advance for your consideration. Counsel is available at Your Honor's convenience if that would be helpful.

Respectfully submitted,

Evan Glassman

cc:

All Counsel of Record (via ECF and electronic mail)